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September 27, 2023

VIA ECF

The Honorable Jennifer H. Rearden
United States District Court
500 Pearl Street
Southern District of New York
New York, New York 10007

Re: United States v. Sergey Shestakov, 23 Cr. 16 (JHR)

Dear Judge Rearden:

I represent Sergey Shestakov in the above-referenced matter. Mr. Shestakov respectfully moves for an order modifying the conditions of his release to allow him to travel to the District of New Jersey. The Government, as stated on the record at the September 19, 2023 conference, has no objection to this request. Mr. Shestakov is being supervised in the District of Connecticut where he resides, and his pretrial services officer in Connecticut informed us that their office does not take a stance on release modifications for courtesy supervision cases.

Mr. Shestakov's current release conditions permit him to travel within: (i) the Southern District of New York; (ii) the Eastern District of New York; and (iii) the District of Connecticut. *See* Dkt. No. 8. We seek to add the District of New Jersey to this list for the following reasons: (1) Mr. Shestakov's wishes to drive his wife to work in Newark, New Jersey; and (2) when visiting his children and grandchildren in Piermont, New York, Mr. Shestakov would like to be able to drive across the GW Bridge and take the Palisades Parkway to Piermont when he is traveling from the Southern District of New York.

Accordingly, we respectfully request that Mr. Shestakov's release conditions be modified to permit his travel to the District of New Jersey.

Respectfully submitted,



Rita Glavin
Counsel for Defendant Sergey Shestakov

cc: D. Conn. Pretrial Services Officer Alan Swartz (via email)